

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE: §  
§  
GRCDALLASHOMES, LLC § Case No. 19-41186  
§  
§  
Debtor. §

**LIMITED OBJECTION OF JOHN CALDWELL TO TRUSTEE  
MOTION FOR AUTHORITY TO PAY ALLOWED CHAPTER 11 ADMINISTRATIVE  
EXPENSE CLAIMS**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES John Caldwell, a creditor and party in interest and files this limited objection and would show as follows:

1. One of the expenses the Trustee proposes to pay is to Olivia Ricci an alleged assignee of the claim of Rouz Law, P.C. John Caldwell holds a state court judgment against Rouz Law, P.C. in the amount of \$570,000.00 plus attorneys fees and costs.

2. Caldwell has filed a garnishment action against the Trustee to seize any amounts owed by this estate to Rouz Law, P.C. As part of the garnishment action Caldwell has sought a declaration that the alleged transfer of the Rouz Law claim to Olivia Ricci was a fraudulent transfer as to Caldwell.

3. Caldwell objects to any payment to Olivia Ricci or Rouz Law pending resolution of the garnishment action.

WHEREFORE, PREMISES CONSIDERED, John Caldwell prays that this court sustain his objection and for such further relief as is just.

Respectfully submitted.

/s/ Robert M. Nicoud, Jr.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 17<sup>th</sup> day of October 2024, a true and correct copy of the foregoing document was sent via electronic means or by first class mail, postage prepaid to the persons shown below:

All parties receiving notice via ECF

/s/ Robert M. Nicoud, Jr.  
Robert M. Nicoud, Jr.